

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

GOLDEN BETHUNE-HILL, et al.,)	
)	
Plaintiffs,)	
)	
v.)	
)	
VIRGINIA STATE BOARD OF)	Civil Action No. 3:14-cv-00852-REP-AWA-
ELECTIONS, et al.,)	BMK
)	
Defendants,)	
and)	
)	
M. KIRKLAND COX, SPEAKER OF THE)	
HOUSE OF DELEGATES, and THE)	
HOUSE OF DELEGATES,)	
)	
Intervenor-Defendants.)	

**Consent Motion for Extension of Time to Reply to
Plaintiffs' Second Motion for Attorneys' Fees and Litigation Expenses and Bill of Costs**

Defendants, by counsel, respectfully request that this Court grant an extension of time to respond to Plaintiffs' Motion for Attorneys' Fees and Litigation Expenses and Bill of Costs. Defendants' counsel has consulted with counsel for Plaintiffs and for Intervenor-Defendants, and they consent to Defendants' request for an extension of time.

On August 2, 2019, Plaintiffs filed their Second Motion for Attorneys' Fees and Litigation Expenses, as well as their Bill of Costs. Dkt. Nos. 385-388. Plaintiffs seek \$4,084,101.25 in attorneys' fees, \$489,096.35 in litigation expenses, and \$223,832.06 in costs, for a total award of more than \$4.7 million. In support of their request, Plaintiffs have submitted approximately 365 pages of billing records and invoices. Given the total amount of fees and costs sought, Defendants need additional time to evaluate the merits of Plaintiffs' motion and

review the accompanying billing records and invoices. Defendants ask that their response be due on or before September 1, 2019, which is 30 days from the filing of Plaintiffs' motion.

WHEREFORE, for the foregoing reasons, Defendants respectfully request that their response to Plaintiffs' Motion for Attorneys' Fees and Litigation Expenses be due on or before September 1, 2019.

Respectfully submitted,

By: /s/
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CERTIFICATE OF SERVICE

I hereby certify that on August 9, 2019, a true and accurate copy of this paper was filed electronically with the Court's CM/ECF system, which will then send a notification of such filing to the counsel of record in this case

By: /s/
Toby J. Heytens